

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, <i>ex rel.</i> ALEX DOE, Relator,	§	
THE STATE OF TEXAS, <i>ex rel.</i> ALEX DOE, Relator,	§	
THE STATE OF LOUISIANA, <i>ex rel.</i> ALEX DOE, Relator,	§	
Plaintiffs,	§	
v.	§	Civil Action No. 2:21-CV-00022-Z
PLANNED PARENTHOOD FEDERATION OF AMERICA, INC., PLANNED PARENTHOOD GULF COAST, INC., PLANNED PARENTHOOD OF GREATER TEXAS, INC., PLANNED PARENTHOOD SOUTH TEXAS, INC., PLANNED PARENTHOOD CAMERON COUNTY, INC., PLANNED PARENTHOOD SAN ANTONIO, INC.,	§	
Defendants.	§	

UNOPPOSED EMERGENCY MOTION FOR CONTINUANCE

Relator respectfully requests that the Court continue the summary judgment hearing set for August 9, 2023, to August 15, 2023. In support of this motion, Relator states as follows:

On the evening of August 2, 2023, the Court issued an order granting Defendants' motion for oral argument (Dkt. 506) and setting a hearing on the parties' motions for summary judgment for August 9, 2023, at 10:00 a.m. Dkt. 513.

Relator's counsel has a scheduling conflict with this hearing date. Andrew Stephens is out of the country and will not return until August 11, 2023. Heather Hacker lacks overnight childcare due to her husband's business trip from August 7 to August 9, 2023, preventing her from traveling to Amarillo from Austin in time for a hearing on August 9. She will also be traveling out of state on August 10 and 11. Relator's counsel thus proposes a brief continuance to allow for their attendance.

Relator's counsel conferred with counsel for Texas and counsel for Defendants before filing this motion. Both parties are unopposed to the relief requested here and are available for a hearing on August 15. Relator's counsel (copying all parties) contacted the courtroom deputy on August 3 before filing this motion to ascertain whether the Court is available on the proposed dates given the quickly approaching hearing and was informed that the Court is also available on August 15.

CONCLUSION

Relator respectfully requests that the Court continue the summary judgment hearing to August 15, 2023.

Respectfully submitted.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker
Texas Bar No. 24103325
Andrew B. Stephens
Texas Bar No. 24079396
HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
(512) 399-3022
heather@hackerstephens.com
andrew@hackerstephens.com

Attorneys For Relator

CERTIFICATE OF CONFERENCE

On August 3, 2023, in accordance with Local Rule 7.1(b), the undersigned certifies that Relator's counsel conferred with counsel for Defendants and for Texas regarding the relief requested in this motion. Both parties are unopposed.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2023, this document was electronically filed and served via the Court's CM/ECF system.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker